



California Regional Water Quality Control Board

San Diego Region



Gray Davis
Governor

Winston H. Hickox
Secretary for
Environmental
Protection

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November 4, 2003

Mr. Mark McPherson
Chief, Land and Water Division
Department of Environmental Health
P.O. Box 129261
San Diego, CA 92112-9261

In Reply Refer To:
POTW: 01-0030.02:VASQV
POTW: 01-0115.02:VASQV
POTW: 01-0146.02:VASQV
POTW: 01-1182.02:VASQV

Dear Mr. McPherson:

SUBJECT: "STANDARD OPERATING PROCEDURES FOR THE COLLECTION OF WATER SAMPLES FOR BACTERIAL ANALYSIS FROM OCEAN AND BAY RECEIVING WATERS" AS DEVELOPED BY THE COUNTY OF SAN DIEGO DEPARTMENT OF ENVIRONMENTAL HEALTH

We have previously notified your agency that tentative addenda to the NPDES permits of agencies discharging to the Encina Ocean Outfall and Oceanside Ocean Outfall will be considered for adoption by the Regional Board during the next Regional Board meeting on November 12, 2003. If adopted, the tentative addenda will increase the receiving water monitoring frequency at surf zone monitoring stations and incorporate by reference "Standard Operating Procedures (SOP) for the Collection of Water Samples for Bacterial Analysis from Ocean and Bay Receiving Waters," as developed by your agency.

The Regional Board has received comments regarding the proposed addenda, and we are forwarding a copy of the comment letter from Encina Wastewater Authority (EWA) to you (please see enclosed). Because the EWA comments are regarding the procedures contained in the SOP, the Regional Board seeks advice from your agency on how to address these comments. We request that your agency review the comment letter and advise the Regional Board in writing no later than noon on Thursday, November 6, 2003 so that your input can be provided to the Regional Board and dischargers prior to the November 12, 2003 Regional Board meeting.

It appears that, if your agency concurs with all or some of the comments, the SOP would require revisions by your agency. Please note that currently the version of the SOP that will be incorporated by reference in the proposed addenda is the version sent by your agency to the Regional Board as an attachment to your correspondence dated October 6, 2003 unless the SOP is officially revised by your agency by November 6, 2003. Therefore, we request that any

California Environmental Protection Agency

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November 4, 2003

changes to the SOP in response to comments be made and sent to the Regional Board office by noon on November 6, 2003 in order to inform the Regional Board and other interested parties of the changes.

The heading portion of this letter includes a Regional Board code number noted after "In reply refer to:" In order to assist us in the processing of your correspondence please include this code number in the heading or subject line portion of all correspondence and reports to the Regional Board pertaining to this matter.

If you have any questions regarding the above, please contact Mr. Victor Vasquez at (858) 636-3155, or via e-mail at vasqv@rb9.swrcb.ca.gov.

Respectfully,


MICHAEL P. McCANN
Supervising Engineer

MPM:bdk:vrw

Enclosures: 1) Encina Wastewater Authority comment letter dated October 24, 2003

cc: Ms. Kathi Moore
Chief, Compliance Office
US Environmental Protection Agency
M.S. WTR-7
San Francisco, CA 94105

Mr. Michael T. Hogan
General Manager
Encina Wastewater Authority
6200 Avenida Encinas
Carlsbad, CA 92009-1095

Mr. Michael T. Thonton
Manager
San Elijo Joint Powers Authority
2695 Manchester Avenue
Cardiff, CA 92007

Mr. Greg Langlois
California Department of Health Services
Shellfish Sanitation Unit
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Mr. Mark McPherson

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November 4, 2003

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Asst. General Manager
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Mr. Ken Schiff
Southern California Water Research Project
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Westminster, CA 92683

Mr. Rolf Frankenbach
Environmental Scientist
California Department of Health Services
Preharvest Shellfish Sanitation Unit
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ENCINA WASTEWATER AUTHORITY

A Public Agency

October 24, 2003

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Carlsbad, CA 92009-1009
Telephone (760) 438-3941
FAX (760) 438-3861 (Plant)
(760) 431-7493 (Admin)

Ref: Admin.03-7349

State Water Resources Control Board
9174 Sky Park Court, Suite 100
San Diego, California 92123-4340

ATTENTION: Mr. John Robertus, POTW Compliance Unit

SUBJECT: TENTATIVE ADDENDA TO MONITORING AND REPORTING
PROGRAMS OF NPDES PERMITS FOR AGENCIES DISCHARGING
TO THE OCEANSIDE AND ENCINA OCEAN OUTFALLS

REFERENCE: POTW: 01-0030.02:VASQV

Dear Mr. Robertus:

As requested in the California Regional Water Quality Control Board (Regional Board) letter dated October 9, 2003, this letter addresses written comments on the TENTATIVE ADDENDUM NO. 3 TO ORDER NO. 2000-36 NPDES NO CA0107395, An Addendum to Revise the Monitoring and Reporting Program for the Encina Wastewater Authority Discharge to the Pacific Ocean Through the Encina Ocean Outfall.

The Encina Wastewater Authority (EWA) appreciates the opportunity to provide the following comments on the "Standard Operating Procedures for the Collection of Water Samples for Bacterial Analysis from Ocean and Bay Receiving Waters":

- Many versions of the Standard Methods for Waster Analysis exist in varying forms; therefore, we suggest using the words, "most current approved version" (Reference: Shoreline Sample Collection, Introduction).
- Wearing gloves during sample gathering is not practical as they become slippery (Reference: Shoreline Sample Collection, General Standard Sampling Procedures).
- The use of 100 ml bottles is not sufficient for the membrane filtration and testing required by the NPDES permit; instead EWA uses 500 ml bottles (Reference: Shoreline Sample Collection, General Standard Sampling Procedures).
- Please provide more clarification on the methods necessary to ensure sterilized samples bottles are EPA approved (Reference: Shoreline Sample Collection, Sampling Report and Documentation).



Mr. John Robertus

Subject: Tentative Addenda to Monitoring and Reporting Programs of NPDES Permits for
Agencies Discharging to the Oceanside and Encina Ocean Outfalls

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Ref: Admin.03-7349.2

- The use of a pole for sampling is not practical, and may pose a safety concern, in some conditions where sampler is required to cross cliffs to get to the shoreline (Reference: Shoreline Sample Collection, Section iv).
- A depth of 12 inches for sampling, in our experience, results in additional sediment in the sample; a depth of greater than 12 inches may be more appropriate (Reference: Shoreline Sample Collection, Section viii).
- During certain conditions, sediment will enter the sample bottle regardless of the sampling procedure (Reference: Shoreline Sample Collection, Section xiii).

Should you have any questions, please do not hesitate to contact Jeff Parks, Laboratory Supervisor, at (760) 438-3941 or jeff@encinajpa.com.

Very truly yours,



Patricia P. Berge, P.E.
Director of Environmental Compliance

cc: Mike Hogan, EWA
Jeff Parks, EWA



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